EXHIBIT 3

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	MDL No. 1456
IN RE PHARMACEUTICAL INDUSTRY)	Master File No. 01-12257-PBS
AVERAGE WHOLESALE PRICE LITIGATION)	
)	Judge Patti B. Saris
)	
THIS DOCUMENT RELATES TO:)	
State of California, ex rel. Ven-A-Care v.)	
Abbott Laboratories Inc, et al.)	
Case No. 03-cv-11226-PBS)	
)	

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1) TO DEFENDANTS MYLAN LABORATORIES INC./MYLAN PHARMACEUTICALS INC.

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Rule 26.2(A) of the Local Rules of the United States District Court for the District of Massachusetts, the State of California ("California") and Ven-A-Care of the Florida Keys, Inc. ("Relator") (collectively "Plaintiffs"), hereby disclose the following information to Defendants Mylan Laboratories Inc. and Mylan Pharmaceuticals Inc. ("Defendants"). Plaintiffs' disclosures are based on information reasonably available to them as of this date. Plaintiffs reserve the right to supplement, amend, or modify these disclosures as additional information becomes available. By making these disclosures, Plaintiffs neither represent that they have identified every document, tangible thing or witness possibly relevant to this litigation, nor waive their right to object to the production of any document or tangible thing disclosed on the basis of any privilege, the work product doctrine, relevance, undue burden or any other valid objection.

Paragraphs A through C and the exhibits described therein address California's disclosures. Paragraph D and the exhibit described therein address Relator's disclosures.

CERTIFICATE OF SERVICE

I, Nicholas Paul, hereby certify that on August 1, 2007, I caused a true and correct copy of the foregoing to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

Dated: August 1, 2007 /s/ Nicholas Paul
NICHOLAS PAUL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via Federal Express on this 1st day of August, 2007 to the following:

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Counsel for Defendants Mylan Laboratories Inc. and Mylan Pharmaceuticals Inc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information is true and correct.

Dated: August 1, 2007 /s/ Nicholas Paul
NICHOLAS PAUL

CALIFORNIA'S ATTACHMENT A

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MDL 1456 - AWP Litigation State of California's Initial Dislcosures

Attachment A

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